No. 86-1778

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IN THE

Supreme Court of the United States

OCTOBER TERM, 1986

THE NASSAU COUNTY REPUBLICAN COMMITTEE AND
THE TOWN OF HEMPSTEAD REPUBLICAN COMMITTEE,
Defendants-Petitioners,

—v.—

LORRAINE C. CULLEN; JOHN L. JUND; AND MICHAEL LANDI, on Behalf of Each, and on Behalf of All Persons Similarly Situated; Namely, Those Employees of the County of Nassau; The Towns of Hempstead and Oyster Bay; and the Village of Hempstead, Who Have Been Subjected to Solicitations for Campaign Contributions to the Republican Party in an Inherently Coercive Manner or Who Have Been Subjected to Scrutiny by Officials of the Republican Party in Connection with Their Hiring, Employment or Promotion; AND CIVIL SERVICE MERIT COUNCIL OF LONG ISLAND,
Plaintiffs-Respondents,

and

THE TOWN OF HEMPSTEAD AND
THE COUNTY OF NASSAU, ET AL.,
Defendants-Respondents.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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6 C. Wright & A. Miller, Federal Practice
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INTRODUCTORY STATEMENT

Respondents respectfully oppose the petition for certiorari herein for three principal reasons:

First, the petition is clearly premature. The Second Circuit's decision below merely reversed an erroneous District Court dismissal on technical grounds involving Rule 49(a) FRCP and remanded to the District Court for a factual determination of petitioners' liability under 18 U.S.C. sec.1961 et. seq. At this stage of the case, there is simply nothing for the Court to review.

Second, the premature nature of the petition wrenches the case out of context. Petitioners ignore the fact that they have

also been found jointly liable with the Town of Hempstead pursuant to 42 U.S.C. sec.1983 for having systematically coerced public employees into contributing one percent of their salaries to the Republican Party. The petition artificially severs petitioners' liability under 18 U.S.C. sec.1961 et. seq. from a parallel liability under 42 U.S.C. sec.1983 and equally artificially severs petitioners' liability from the joint and several liability of the Town of Hempstead.

Third, the substantive issues raised by the petition are without merit.

Petitioners argue that a political machine found to have engaged in systematic extortionate activity should be immunized from the reach of laws designed to protect the community from extortion. Having been found guilty of coercing thousands of public

employees into making involuntary payments to the Nassau County Republican Party treasury, the Party may not refuse to refund the coerced contributions by seeking to immunize its treasury from liability.

COUNTER-STATEMENT OF THE CASE

A. Introduction

Petitioners have filed a seriously misleading petition for certiorari.

The gravamen of their petition is that innocent current members of the Nassau County Republican Party risk individual liability for the refund of campaign contributions coerced from public employees by the Republican Party organization and the Town of Hempstead during the 1970's. Petition for Certiorari, at pp. 3-4. However, as petitioners well know, plaintiff-class seeks

refunds and appropriate damages solely from the collective assets of the Party and the Town of Hempstead and has repeatedly disavowed any intent to seek to impose individual liability on any current member of the Republican Party. Thus, the true issue raised by this petition is whether unincorporated associations such as political party organizations or labor unions can extort hundreds of thousands of dollars from vulnerable victims and then avoid liability for the refund of the extorted funds by immunizing their treasuries from liability imposed in accordance with Rule 17(b)(1) FRCP.

B. Statement of Essential Facts

This class action arose out of allegations that public employees of the Town of Hempstead and the County of Nassau were

forced to pay one percent of their annual salaries to the Nassau County Republican organization as a so-called "voluntary" campaign contribution in order to receive promotions, raises or favorable job assignments to which they were otherwise entitled. Plaintiff-class seeks a refund of any coerced contributions together with an award of damages to class-members who were denied raises, promotions or favorable job status because they failed to contribute. Plaintiff-class predicates its claim for relief on 42 U.S.C. sec.1983 since the Town of Hempstead and the Nassau County Republican organization acted jointly under color of law to deny members of the plaintiff-class their First Amendment rights to decide whether or not to contribute to the political party of their choice. E.g., Pipefitters v. United

States, 407 U.S. 385 (1972); Elrod v. Burns, 427 U.S. 347 (1976); Abood v. District Board of Eduction, 431 U.S. 209 (1977); Branti v. Finkel, 445 U.S. 507 (1980). In addition, the petitioners' systematic extortionate activity gives rise to a claim under 18 U.S.C. sec.1961 et. seq (RICO).

After protracted pre-trial proceedings, occasioned in part by the indictment and conviction of Nassau County Republican Party Chairman Joseph Margiotta for demanding that insurance brokers doing business with Nassau County kick-back 50 percent of their commissions to the Nassau County Republican organization,* the District Court ordered the trial bifurcated into liability and remedial phases. The issue of

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* See United States v. Margiotta, 688 F.2d 108 (2d Cir. 1982) cert. denied, 461 U.S. 913 (1983).

liability was tried before a jury from July 29, 1985 - September 4, 1985. At trial, plaintiff-class presented overwhelming evidence that petitioners, in close cooperation with the Town of Hempstead,* operated a coercive political fund-raising scheme that forced public employees to contribute one percent of their salaries to the Republican organization every year.** At

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* The Town of Hempstead is the largest political subdivision in Nassau County, accounting for approximately 60 percent of the County's population.

** Respondents' proof is set forth in the multi-volume appendix lodged with the Second Circuit in connection with the Rule 54(b) appeals below.

Respondents demonstrated the coercive scheme by presenting the testimony of six key figures in the Nassau County Republican organization and ten officials of the Town of Hempstead and the County of Nassau who described the scheme's operation, as well as the testimony of fifteen members of the plaintiff-class who described the impact of the scheme. In addition, respondents

introduced voluminous documentary material chronicling the scheme's operation. Respondents annex, as a supplementary appendix, the following three representative items of documentary evidence.

Plaintiffs' Exhibit I consists of a letter from Senator Alfonse D'Amato, then Supervisor of the Town of Hempstead, to Donald Woolnough, then an official of the Nassau County Republican organization, in which then Supervisor D'Amato states:

> I have spoken to Mr. Margiotta [the Party Chairman] and he has indicated that the raise for Mr. Robert Marcus of the Sanitation Department would be approved if he took care of the 1 %. Respondents' Supplementary Appendix at SA 1.

Several days after a payment of $75 was made to Republican Party headquarters on Mr. Marcus' behalf, he received a raise from $7,870 to $8,202 per year.

Plaintiffs' Exhibit 28 consists of an affidavit submitted in lieu of testimony before a Grand Jury by Muriel DeLac, Director of Personnel of the Town of Hempstead, in which she admits that proposed raises and promotions for public employees were routinely forwarded to Republican Party headquarters for approval or rejection. Respondents' Supplementary Appendix at SA 2-5.

the close of testimony from almost two hundred witnesses, the District Judge propounded seventy-seven Special Interrogatories to the jury in accordance with Rule 49(a).* The jury's answers to the Special Interrogatories explicitly found that, from 1973-1976, petitioners, in concert with the Town of Hempstead, had operated a practice and procedure of coercively soliciting campaign contributions from public employees by "exploiting the employee's fears that they would lose promotions and other benefits if

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Finally, Plaintiffs' Exhibit 5 consists of hundreds of recommended promotions or raises for public employees which were vetoed or approved by Republican Party headquarters. A representative example of the several hundred introduced into evidence is reproduced in the supplemental appendix at SA 6.

* The jury's answers to the Special Interrogatories are set forth in Petitioners' Appendix C at pp. 20c-33c.

they refused to contribute." Petitioners' Appendix C, pp. 20c-22c. The jury also found that petitioners and the Town of Hempstead had engaged in thirteen specified acts of extortionate behavior directed at coercing eleven specified public employees into paying sums to the Republican Party through fear of loss of employment benefits. See Special Verdict, Question 7 and 8, set forth in Petitioners' Appendix C at pp. 24c-27c.

The District Court, in accordance with the jury's Special Verdict, ruled that "the jury's findings compel a conclusion that [petitioners and the Town of Hempstead] are liable to plaintiffs in damages pursuant to 42 U.S.C. sec.1983." Petitioners' Appendix C at p. 9c. However, despite the District Court's recognition that the jury had found each petitioner to be "an entity which knowingly

and wilfully engaged in a pattern of illegal activity," the District Court dismissed plaintiff-class' cause of action under 18 U.S.C. sec.1964 because, in the District Court's view, the jury had failed to find the requisite "association between defendants as entities and a RICO enterprise." Petitioners' Appendix C at 9c-12c. The District Court permitted plaintiff-class an immediate appeal from the dismissal of its RICO claims pursuant to Rule 54(b). In addition, the District Court certified several issues affecting the sec.1983 remedial phase to the Circuit pursuant to 28 U.S.C. sec.1292(b). The Circuit declined to review the sec.1292(b) issues and ruled that the interlocutory nature of the case precluded appellate review of the issues raised by petitioners. Petitioners' Appendix B at pp. 14b-19b; 71b-72b. The

Circuit did, however, reach the merits of the Rule 54(b) appeal and reversed the District Court's dismissal of plaintiff-class' RICO claims. Petitioners' Appendix B at pp. 58b-72b. The Circuit recognized that the jury's failure to have made a specific finding of an association between petitioners as RICO entities and the RICO enterprise was caused by the inadvertent phrasing of Question 9 of the Special Verdict, which prevented the jury from expressing its obvious intention to find petitioners guilty of violating 18 U.S.C. sec.1964.* Petitioners' Appendix B at pp. 59b-68b. Accordingly, the Circuit directed the District Court to make a factual finding

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* The Circuit also reversed the District Court's refusal to recognize a toll of the limitation period occasioned by duress and the pendency of a putative state class action. Petitioners' Appendix B at pp. 34b-50b; 58b-59b. Petitioners do not seek review of that aspect of the Circuit's decision.

concerning petitioners' association with the RICO enterprise.* Although petitioners concede that, on the record, it will be virtually impossible for the District Court to find in their favor, Petition for Certiorari, at p. 12, no RICO finding has yet been entered.

Thus, at this stage of the proceedings, petitioners and the Town of Hempstead have been found liable to the plaintiff-class under 42 U.S.C. sec.1983 for the period from 1973-1976, with the remedial phase of the sec.1983 case still to be completed.** In addition, the District Court

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* Petitioners do not seek review of the Circuit's refusal to permit an inadvertent flaw in the phrasing of Special Verdict Question 9 to frustrate the obvious intent of the jury.

** The sec.1983 remedial phase will entail the delivery of notices of claim to the approximately 25,000 class members, together

has been directed to rule on the liability of petitioners and the Town of Hempstead under 18 U.S.C. sec.1964, but has not yet done so. If, as both petitioners and respondents predict, the District Court imposes RICO liability on petitioners, the parties will move to the remedial phase of the case on both the sec.1983 and RICO claims. Finally, the District Court must determine all defendants' liability for the period from 1970-1973. Despite the substantial work that remains to be completed in the District Court on both the liability and the remedial phases; despite the

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with individual factual hearings on contested issues of fact. Plaintiff-class has argued for an anonymous remedial mechanism that would permit employees to claim refunds without petitioners' knowledge. Petitioners have insisted that persons seeking refunds reveal their identities. The parties also differ widely on the issues of punitive damages, class-wide compensatory damages and burdens of proof.

fact that the District Court has not yet even ruled on the issue of RICO liability; and despite the fact that the Second Circuit has labelled their claims clearly premature, petitioners persist in seeking to wrench a piece of this complex case out of context and present it to this Court for interlocutory review.

REASONS WHY THE PETITION SHOULD BE DENIED

I. In its Present Posture, the Petition is Clearly Premature

Although this Court undoubtedly posses power to engage in piecemeal interlocutory review of cases originating in the federal trial courts, long-standing policies of sound judicial administration and conservation of scarce judicial resources

argue strongly against interlocutory appellate review, especially in those settings where interlocutory review cannot materially ease the workload of the trial courts. The already strong presumption against interlocutory appellate review is, moreover, intensified in those settings where, as here, the Circuit courts have already declined to exercise interlocutory appellate review over the issue.

This petition presents a textbook example of an inappropriate attempt to secure piecemeal interlocutory review. The District Court has not yet even ruled on petitioners' liability under 18 U.S.C. sec.1964; the Circuit court has declined to exercise interlocutory appellate review over the precise issues presented by the petition*;

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* Indeed, it is probable that this Court lacks certiorari jurisdiction over the issues raised by petitioners since the Circuit

and, whatever petitioners' liability under 18 U.S.C. sec.1961 et.seq., the District Court will be obliged to carry out a full scale remedial proceeding in connection with the District Court's finding of liability under 42 U.S.C. sec.1983.*

Thus, no basis whatever exists to depart from this Court's long-standing reluctance to engage in piecemeal interlocutory review. Indeed, were certiorari even to be seriously considered in the present posture of this case, litigants will be encouraged to ignore the refusal of Circuit courts to exercise interlocutory appellate review in the hope of obtaining immediate review by this Court.

Court lacked jurisdiction to hear them.

* Petitioners have not sought certiorari on any issue relating to their liability under sec.1983.

II. The Premature Nature of the Petition Wrenches the Issues Presented Out of Context

Petitioners, by seeking interlocutory review of a single issue in a complex case involving multiple parties, present an artificially truncated vehicle for review.

First, by focussing solely on liability under 18 U.S.C. sec.1964, petitioners ignore their parallel liability under 42 U.S.C. sec.1983 and, thus, present a distorted issue for review. Given the existence of a parallel liability under sec.1983, petitioners' Party treasury will continue to be liable for substantial damages under sec.1983 whether or not sec.1964 liability is upheld. Thus, petitioners' suggestion that an extraordinary grant of

interlocutory review is warranted in order to free the Party treasury from a substantial liability is quite misleading.

Second, by filing a petition that wholly ignores the parallel liability of the Town of Hempstead under both 42 U.S.C. sec.1983 and 18 U.S.C. sec.1964, petitioners obscure the fact that any decision immunizing the Party treasury from liability will merely shift the full economic cost of petitioners' extortionate activity to the Town of Hempstead.*

Third, by filing a petition suggesting

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* A serious conflict of interest appears to exist on the part of the current Chairman of the Nassau County Republican Committee and the Town of Hempstead Republican Committee (the petitioners) who also serves as Presiding Supervisor of the Town of Hempstead. The best interest of the Town of Hempstead would appear to call for opposition to petitioners' attempt to shift sole liability to the Town of Hempstead.

that current individual members of the Republican Party risk individual liability under either 42 U.S.C. sec.1983 or 18 U.S.C. sec.1964, petitioners persist in presenting a false issue. Respondents have repeatedly recognized that the wording and spirit of Rule 17b(1) FRCP renders the collective assets of an unincorporated association liable for violations of federal norms, but does not impose personal liability on innocent members of the association. Petitioners are the beneficial owners of substantial assets, including valuable real estate holdings and substantial bank accounts. It is to those collective assets that respondents look in seeking refunds and damages. Moreover, petitioners may, if they wish, seek contribution from those individuals who played principal roles in the extortionate scheme.

What petitioners may not do is to extort hundreds of thousands of dollars from vulnerable public employees and then refuse to give the money back.

III. The Issues Raised by the Petition are Without Merit

Petitioners argue that, as unincorporated associations under New York law, political party committees are not "persons" within the meaning 18 U.S.C. sec.1961 et. seq. and, in any event, cannot be held financially liable for the violation of federal norms. Both arguments border on the frivolous.

A. Petitioners are Persons Within the Meaning of 18 U.S.C. sec.1961 et. seq.

Congress explicitly defined the term "person" in 18 U.S.C. sec.1961 et. seq. as

"any individual or entity capable of holding a legal or beneficial interest in property." 18 U.S.C. sec.1961(3). It is uncontested that political committees such as petitioners are capable of holding substantial beneficial interests in property. Indeed, petitioners maintain substantial bank accounts and own valuable real estate in Nassau County. Thus, no serious argument exists that petitioners are immune from the reach of 18 U.S.C. sec.1961 et. seq. because they do not constitute persons.

B. Petitioners, as Unincorporated Associations, May (1) Be Sued in Federal Court as Entities Pursuant to Rule 17(b) FRCP; and (2) Any Resulting Judgment May be Enforced Against their Collective Assets

Petitioners persist in arguing that since they are unincorporated associations under New York law, they may not be held

liable for refunds or damages herein. Taken seriously, petitioners' position would immunize political committees from any risk of liability for violating constitutional rights, to say nothing of simple contracts. Fortunately, the Committees' position has no support whatever.

This Court has repeatedly held that the substantive liability of "persons" sued under 42 U.S.C. sec.1983 and, presumably, 18 U.S.C. sec.1964 does not turn on defenses, conditions or immunities established by state law, but must be governed by uniform federal standards. E.g., Martinez v. California, 444 U.S. 277, 284, n. 8 (1980); Owen v. City of Independence, 445 U.S. 622, 647 n. 30 (1980). Thus, whatever the liability of unincorporated associations under New York State law, the Committees' substantive liability for having

systematically violated the First Amendment and RICO is to be determined under federal standards. Since 1922, the uniform federal standard governing the liability of unincorporated associations sued in federal court for violating federal law has recognized, first, that unincorporated associations are suable as entities in federal court and, second, that any judgment so procured may be enforced against the association's collective assets. See, e.g., United Mine Workers v. Coronado Coal Co., 259 U.S. 344 (1922) (labor unions suable as unincorporated association in federal court; judgment enforceable against union funds); Brown v. United States, 276 U.S. 134, 140-41 (1928) (unincorporated association of furniture manufacturers suable under Sherman Act). The holding of Coronado Coal has been

codified as Rule 17(b)(1) FRCP, which provides:

> [C]apacity to sue or be sued shall be determined by the law of the state in which the district court is held, except (1) that a partnership or other unincorporated association, which has no such capacity by the law of such state, may sue or be sued in its common name for the purpose of enforcing for or against it a substantive right existing under the Constitution or laws of the United States ... (emphasis added).

Federal courts have uniformly read Rule 17(b) to authorize suits against unincorporated associations to vindicate federal rights and have uniformly recognized that judgments so obtained are enforceable against the association's collective assets. In Sperry Products v. Association of American Railroads, 132 F.2d 408 (2d Cir. 1942), for example, Judge Learned Hand held:

> "Before the decision in United Mine Workers v. Coronado Coal Co.,

> [citation omitted], an unincorporated association could not be sued in a federal court unless all the members were joined ... That case laid it down that such associations could be sued as such, and that execution upon the judgment would go against their collective funds. Rule 17(b) now covers the same ground. 132 F.2d at 410.

See also, Markewich v. Adikes, 422 F. Supp. 1144 (E.D.N.Y. 1976). In fact, Rule 17(b) has been uniformly applied to permit suits to enforce federal substantive rights for or against political parties, Ripon Society v. National Republican Party, 525 F.2d 567, 571 n. 5 (D.C. Cir. 1975) (en banc), cert. denied, 424 U.S. 933 (1976); labor unions, Council No. 34, American Federation of State, County and Municipal Employees, 465 F.2d 221, 223-24 (7th Cir. 1972); Jersey Farms Milk Service, Inc. v. Amalgamated Meat Cutters and Butcher Workmen, 297 F. Supp. 1098, 1101-02 (M.D. Tenn. 1969); Gilmour v. Wood, Wire

and Metal Lathers International Union, Local No. 74, 223 F. Supp. 236, 246-47 (N.D. Ill. 1963); Wilson & Co. v. United Packing House Workers, 83 F. Supp. 162, 166 (S.D.N.Y. 1949); an unincorporated commodities pool, Commodity Futures Trading Commission v. Chilcott Portfolio Management, Inc., 713 F.2d 1477, 1482 (10th Cir. 1983); an association of railroads, Sperry Products, Inc. v. Association of American Railroads, 132 F.23 408, 410 (2d Cir. 1942) (L. Hand, J.), cert. denied, 319 U.S. 744 (1943); a student group, Associated Students of University of California at Riverside v. Kleindienst, 60 F.R.D. 65, 66-67 (C.D. Cal. 1973) (enforcing First Amendment rights); and a senior citizens' organization, Action Alliance for Senior Citizens v. Shapp, 400 F. Supp. 1208, 1212 & n. 15 (E.D. Pa. 1975). See generally

3A J. Moore & J. Lucas, Moore's Federal Practice para.17.25, at 17-244 to 17-253 (1985); 6 C. Wright & A. Miller, Federal Practice & Procedure, at 743-47 (1971 & 1984 Supp.).

Where, as here, liability is predicated on a long-standing pattern of behavior engaged in by the highest ranking officers of the Committees, the unlawful activity is fairly ascribable to the Committees, especially since the coercively solicited funds in question were paid to the Committees themselves. Moreover, whatever concerns might surround attempts to impose liability on individual members of the Republican Party, plaintiff-class has repeatedly disclaimed any intention of seeking to enforce any judgment herein against current Republican Party members and has agreed, in

deference to the wording of Rule 17(b)(1), to enforce any judgment herein solely against the Committees' collective assets and the assets of the Town of Hempstead.

Finally, petitioners' suggestion that the First Amendment immunizes political committees from liability for their extortionate acts borders on the ludicrous. Taken seriously, petitioners' argument would cloak any self-styled political organization, including the Ku Klux Klan, with a license to engage in blatant unlawful activity, secure in the knowledge that no judgment could ever be obtained against the organization's collective assets. It is a crowning irony for petitioners, who, for years, trampled on the First Amendment rights of public employees in Nassau County, to seek to escape financial responsibility for their extortionate behavior

by seeking shelter in a spurious First Amendment immunity that would reward them by allowing them to retain their ill-gotten gains.

CONCLUSION

The petition should be denied.

Dated:
June 2, 1987

Respectfully submitted,

Burt Neuborne
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Plaintiff-Class
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New York, New York 10012
(212) 998-6172

RESPONDENTS'

SUPPLEMENTARY APPENDIX

SA 1

Alfonse M. D'Amato
SUPERVISOR

June 9, 1971

Mr. Donald Woolnough
Nassau County Republican Headquarters
Garden City Hotel
Garden City, NY 11530

Dear Don,

I have spoken to Mr. Margiotta and he has indicated to me that the raise for Mr. Robert Marcus of the Sanitation Department would be approved if he took care of the 1%.

Accordingly, please find check for $75.00 from the Island Park Republican Committeemen's Council.

Warmest personal regards,

Cordially,

s/Al

Alfonse M. D'Amato
Supervisor

"Muriel Delac, being duly sworn, deposes and says:

"1. I am presently employed as the Director of Personnel for the Town of Hempstead, Nassau County, New York. As such, my duties and responsibilities included reviewing applications for employment with the Town of Hempstead as well as reviewing applications for raises and promotions by those already so employed.

"2. Prior to my appointment as Director of Personnel, I served as Assistant Director under Mr. Harold Braun, for approximately nine or ten years. In all, I have been employed by the Town of Hempstead for approximately 27 years."

This affidavit is dated June 24,

1975.

"3. Until approximately the fall of 1974, I followed an unvarying practice regarding the screening and approval of raises and promotions for the Town of Hempstead employees. That practice, for at least the last twenty years was as follows: Requests for raises and promotions, would be referred by department heads to my attention for action by the Personnel Department. I would, in each and every instance, transmit these requests to the attention of the officials of the Town of Hempstead or Nassau County Republican Committee. Subsequently, each request would be returned with a notation which would read either "approved" or "denied" and which would be initialled by either Mr. Donald Woolnough, in recent years, or his secretary, Mrs. Arlene

Matthewson. I would separately retain the note or memo, which I received back from the Republican Committee, leaving no record of this in the employee's permanent personnel folder. Finally, I would telephone the appropriate department head, advising him or her, as to the decision of the Personnel Department, which would in every instance in which we had forwarded the application to them, be the decision of the Republican Committee. I felt that I had no discretion to contravene their decision. This entire procedure of obtaining political clearance from the Republican Committee goes back many, many years, and I cannot recall at whose direction it was initiated.

"4. With regard to hiring for the

Town of Hempstead, it has been the practice for as far back as I can remember that the only persons whom we approve are those who are referred by the Republican Party. Walk-ins without the prior approval of the party are not offered jobs.

"5. I have read the foregoing in its entirety and to the best of my knowledge and recollection, it is the truth, the whole truth and nothing but the truth. I further recognize that my statements herein are made under the pains and penalties of perjury. However, this statement is voluntarily made by me," signed M. Muriel Delac, dated Nassau County, New York, June 24, 1975.

for [illegible] E 63 1975

PLAINTIFF'S EXHIBIT SE

DATE 8-1-74.

NAME [illegible]

ADDRESS [illegible]

DEPARTMENT [illegible]

PRESENT POSITION [illegible]

RECOMMENDATION [illegible]

COMMENT

10/8 disapproved

10/16 again

SA6

BEST AVAILABLE COPY